

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 17-264 DWF/KMM

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) CHRISTOPHER MICHAEL JENNINGS

a/k/a "CJ,"

(2) KAREEM KAREL MITCHELL,

a/k/a "Kareem Karel Ase,"

(3) JAMES ARTHUR MALLETT,

(4) NORVELL LARON DEAL,

Defendants.

INDICTMENT

18 U.S.C. § 2

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 924(d)(1)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 846

28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute a Controlled Substance)

1. Beginning in on or about 2016, and continuing through the present, in the State and District of Minnesota and elsewhere, the defendants,

CHRISTOPHER MICHAEL JENNINGS,

a/k/a "CJ,"

KAREEM KAREL MITCHELL

a/k/a "Kareem Karel Ase"

JAMES ARTHUR MALLETT, and

NORVELL LARON DEAL,

did knowingly and intentionally conspire with each other and with others known and unknown to the grand jury distribute a controlled substance, to wit: a mixture or substance containing a detectable amount of heroin; a mixture or substance containing a detectable

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amount of cocaine; and a mixture or substance containing a detectable amount of cocaine base; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Quantities of Controlled Substances Involved in the Conspiracy

2. With respect to defendant **CHRISTOPHER MICHAEL JENNINGS**, his conduct, which included the reasonably foreseeable conduct of other members of the conspiracy, involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, a controlled substance; a mixture or substance containing a detectable amount of cocaine base, a controlled substance; and a mixture or substance containing a detectable amount of cocaine, a controlled substance; in violation of Title 21, United States Code, Section 841(b)(1)(A).

3. With respect to **KAREEM KAREL MITCHELL, JAMES ARTHUR MALLET**, and **NORVELL LARON DEAL**, their conduct, which included the reasonably foreseeable conduct of other members of the conspiracy, involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a controlled substance; a mixture or substance containing a detectable amount of cocaine base, a controlled substance; and a mixture or substance containing a detectable amount of cocaine, a controlled substance; in violation of Title 21, United States Code, Section 841(b)(1)(B).

COUNT 2

(Possession with Intent to Distribute a Controlled Substance)

On or about June 21, 2017, in the State and District of Minnesota, the defendant,

CHRISTOPHER MICHAEL JENNINGS

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a/k/a "CJ,"

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

(Possession of a Firearm by a Prohibited Person)

On or about June 21, 2017, in the State and District of Minnesota, the defendant,

CHRISTOPHER MICHAEL JENNINGS

a/k/a "CJ,"

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

Offense	Place of Conviction	Date of Conviction (On or About)
Second Degree Possession of a Controlled Substance	Hennepin County, MN	March 28, 2008
Second Degree Possession of a Controlled Substance	Hennepin County, MN	May 14, 2012

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a Springfield XD-40 .40 caliber semi-automatic firearm, serial number GM144153, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 4

(Distribution of a Controlled Substance)

On or about August 15, 2017, in the State and District of Minnesota, the defendant,

CHRISTOPHER MICHAEL JENNINGS,

a/k/a "CJ,"

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did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5

(Distribution of a Controlled Substance)

On or about September 12, 2017, in the State and District of Minnesota, the defendants,

CHRISTOPHER MICHAEL JENNINGS,
a/k/a "CJ,"
JAMES ARTHUR MALLET, and
NORVELL LARON DEAL,

each aiding and abetting the other, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6

(Distribution of a Controlled Substance)

On or about September 13, 2017, in the State and District of Minnesota, the defendants,

JAMES ARTHUR MALLET, and
NORVELL LARON DEAL,

each aiding and abetting the other, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United

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States Code, Section 2.

COUNT 7

(Distribution of a Controlled Substance)

On or about September 21, 2017, in the State and District of Minnesota, the defendant,

KAREEM KAREL MITCHELL,
a/k/a "Kareem Karel Ase,"

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 8

(Possession with Intent to Distribute a Controlled Substance)

On or about September 22, 2017, in the State and District of Minnesota, the defendants,

KAREEM KAREL MITCHELL,
a/k/a "Kareem Karel Ase,"
JAMES ARTHUR MALLETT, and
NORVELL LARON DEAL,

each aiding and abetting the others, did knowingly and intentionally possess, with the intent to distribute, a mixture or substance containing a detectable amount of heroin, a controlled substance; a mixture or substance containing a detectable amount of cocaine base, a controlled substance; and a mixture or substance containing a detectable amount of cocaine, a controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18 United States Code, Section 2.

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COUNT 9

(Possession of a Firearm by a Prohibited Person)

On or about September 22, 2017, in the State and District of Minnesota, the defendant,

NORVELL LARON DEAL,

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

Offense	Place of Conviction	Date of Conviction (On or About)
Assault	De Kalb, County, IL	May 22, 2013

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a PW Arms 9mm firearm, serial number BAM02118, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 10

(Possession of a Firearm by a Prohibited Person)

On or about September 22, 2017, in the State and District of Minnesota, the defendant,

KAREEM KAREL MITCHELL,
a/k/a "Kareem Karel Ase,"

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

Offense	Place of Conviction	Date of Conviction (On or About)
5th Degree Drug Possession	Ramsey County, MN	May 1, 2003

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Offense	Place of Conviction	Date of Conviction (On or About)
3rd Degree Drug Possession	Ramsey County, MN	September 11, 2003
2nd Degree Drug Possession	Ramsey County, MN	May 2, 2006
2nd Degree Drug Sale	Ramsey County, MN	May 2, 2006
Refusal to Submit to Chemical Test	Ramsey County, MN	May 2, 2006
Driving While Impaired	Washington County, MN	October 10, 2006
3rd Degree Drug Possession	Ramsey County, MN	April 16, 2009
Driving While Impaired	Dakota County, MN	December 13, 2011

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a SKS 7.62 caliber rifle, serial number 43478, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATIONS

Counts 1 through 10 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), and Title 21, United States Code, Section 853(a), in conjunction with Title 28, United States Code, Section 2461(c).

If convicted of Counts 1-2, or 4-8 of this Indictment, the defendants,

CHRISTOPHER MICHAEL JENNINGS,
a/k/a "CJ,"
KAREEM KAREL MITCHELL
a/k/a "Kareem Karel Ase"
JAMES MALLET, and
NORVELL LARON DEAL,

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shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

If convicted of Counts 3, 9, or 10 of this Indictment, the defendants,

CHRISTOPHER MICHAEL JENNINGS

a/k/a "CJ,"

KAREEM KAREL MITCHELL

a/k/a "Kareem Karel Ase," and

NORVELL LARON DEAL,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) in conjunction with Title 28, United States Code, Section 2461(c), any firearm with accessories or any ammunition involved in or used in any knowing violation of Sections 922(g)(1) or 922(a)(6), including, but not limited to a Springfield XD-40 .40 caliber semi-automatic firearm, serial number GM144153; a PW Arms 9mm firearm, serial number BAM02118; and a SKS 7.62 caliber rifle, serial number 43478, and ammunition seized therewith.

All in violation of Title 18, United States Code, Sections 922(g)(1), 922(a)(6), 924(a)(2), in conjunction with Title 28, United States Code, Section 2461(c), and Title 21,

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United States Code, Section 853.

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ACTING UNITED STATES ATTORNEY

FOREPERSON